

# **Exhibit 16**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC., )  
Plaintiff, )  
vs. ) Civil Action No.  
SAMSUNG ELECTRONICS CO., LTD., ) 2:21-CV-463-JRG  
SAMSUNG ELECTRONICS AMERICA, )  
INC., SAMSUNG SEMICONDUCTOR, INC., )  
Defendants. )  
\_\_\_\_\_ )

VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED  
DEPOSITION OF SUNGJOO PARK

Remotely Testifying from Hwaseong, South Korea  
Wednesday, November 23, 2022 (Local GMT+9 Zone)

Stenographically Reported By:  
Hanna Kim, CLR, CSR No. 13083  
Job No. 5567465

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SAMSUNG ELECTRONICS AMERICA, )  
INC., SAMSUNG SEMICONDUCTOR, INC., )  
Defendants. )  
\_\_\_\_\_ )

\_\_\_\_\_,  
virtual videoconference video-recorded deposition of  
SUNGJOO PARK, remotely testifying from Hwaseong,  
South Korea, on Wednesday, November 23, 2022 (Local  
GMT+9 Zone), pursuant to the stipulations of counsel  
thereof, before Hanna Kim, CLR, Certified Shorthand  
Reporter, No. 13083.

1 REMOTE VIDEOCONFERENCE APPEARANCES OF COUNSEL:

2  
3 FOR PLAINTIFF NETLIST, INC.:

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10  
11 FOR DEFENDANTS SAMSUNG ELECTRONICS CO., LTD.,  
12 SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG  
13 SEMICONDUCTOR, INC.:

14 FISH & RICHARDSON, P.C.

15 BY: KAROLINA JESIEN, ESQ.

16 BY: JEFF BURTON, ESQ.

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22  
23  
24  
25  
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1 REMOTE VIDEOCONFERENCE APPEARANCES: (CONTINUED)

2  
3 ALSO PRESENT:

4 SOOMI KO, Korean-language main/official  
5 interpreter

6 MICHELLE KIM, Check interpreter

7 SHAWNA HYNES, Video Operator

8 NEIL MARTIN, Concierge  
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1 THE WITNESS: I don't think the entire  
2 document --

3 (Interruption in audio/video.)

4 THE COURT REPORTER: Could you -- could  
5 you start that over again, please.

6 THE MAIN INTERPRETER: Okay.

7 THE WITNESS: I don't think it was the  
8 entire document. I think some portion was modified.  
9 And let me look for that.

10 THE MAIN INTERPRETER: Also, Hanna,  
11 previously the answer is not -- I think I  
12 mispronounced it ballot, not "valid," B-A-L-L-O-T.

13 THE WITNESS: Since these are not  
14 color- -- coloring was -- oh, strike that.

15 Since the fonts are not separated by  
16 colors, I don't exactly know which portion was  
17 updated.

18 BY MR. SHEASBY:

19 Q. The point is this was a proposal that was  
20 sponsored by Samsung?

21 A. It is true that that's a ballot Samsung  
22 sponsor [verbatim], since my name and Samsung's name  
23 is there.

24 Q. And it's from 2007; correct?

25 A. Yes. That's correct.

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1 Q. And why don't you turn to PDF page 147 of  
2 this document -- 140- -- PDF page 147.

3 A. Yes, I am there.

4 Q. Do you see under the section "Seri-" --  
5 "Serial Presence Detect"?

6 A. Yes, I see that.

7 Q. It says, quote, "a rank of memory is  
8 defined as the collection of SDRAMs," plural,  
9 "driven by a given rank select signal."

10 Do you see that?

11 A. Yes, I see that.

12 Q. Sir, this statement is incorrect; the  
13 accepted definition of rank in 2007 or 2008 in the  
14 concept of DRAM memory modules includes a single  
15 DRAM; correct?

16 MS. JESIEN: Objection. Form.

17 THE WITNESS: No, that's not right.

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CERTIFICATE OF REPORTER

I, Hanna Kim, a Certified Shorthand Reporter, do hereby certify:

That prior to being examined, the witness in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said proceedings were taken before me at the time and place therein set forth remotely via videoconference and were taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision;

I further certify that I am neither counsel for, nor related to, any party to said proceedings, not in anywise interested in the outcome thereof.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [x] was [ ] was not requested.

In witness whereof, I have hereunto subscribed my name this 12th day of December, 2022.



Hanna Kim, CLR, CSR No. 13083